

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

IN RE:)	
)	
INTEL CORP. MICROPROCESSOR)	MDL Docket No. 05-1717 (JJF)
ANTITRUST LITIGATION)	
)	
PHIL PAUL, on behalf of himself)	
and all others similarly situated,)	C.A. No. 05-485-JJF
)	
Plaintiffs,)	CONSOLIDATED ACTION
)	
v.)	
)	
INTEL CORPORATION,)	
)	
Defendant.)	
)	

JOINT PROPOSED AGENDA FOR MAY 4, 2006 INITIAL CONFERENCE

Pursuant to the Court's April 18, 2006 Order (D.I. 51), Class Plaintiffs and Defendant Intel Corporation ("Intel") have conferred, and by and through their undersigned attorneys, jointly offer for the Court's consideration the following proposed agenda items for the May 4, 2006 Initial Conference:

1. **Jurisdictional Issues.** The Court currently has remand motions pending in the following two constituent cases: *Wiles v. Intel Corp.*, No. 1:05-cv-00914-JJF and *Chance v. Intel Corp.*, which was recently transferred from the United States District Court for the District of Kansas. Both motions are fully briefed.

2. **Intel's Response to the Consolidated Class Complaint.** Plaintiffs will serve and file their Consolidated Class Complaint on April 28, 2006. Pursuant to the Court's April 10, 2006 Order (D.I. 48), Intel's response is due June 27, 2006. The parties will seek the Court's guidance on a briefing schedule for any dispositive motions that Intel may file.

3. **State-Federal Coordination.** AMD and Intel together with state and federal class counsel have been discussing a joint proposal for coordinated discovery in the matters before this Court and the Santa Clara Superior Court (before whom the California purported class actions have been consolidated) and any other related state class actions that may be filed in the future. The parties propose updating the Court on the status of these discussions.

4. **Class Certification.** The Parties propose exploring with the Court the following issues:

- a. Target Date for Hearing on Class Motion;
- b. Coordination of Class and Merits Discovery; and
- c. Date for Parties to Propose Briefing Schedule.

5. **Merits Discovery.** The Parties propose exploring with the Court the following issues:

- a. Discovery coordination between MDL 1717 and *Advanced Micro Devices, Inc. v. Intel Corp., et al.*, No. 1:05-00441-JJF; and
- b. E-discovery.

6. **Case Management Plan and Order.** The Parties will be prepared to present items appropriate for inclusion in the Case Management and Scheduling Order, consistent with the parameters that the Court established in connection with the Initial Conference in *Advanced Micro Devices, Inc. v. Intel Corp.*, No. 1:05-cv-00441-JJF. The parties expect that these items will be coordinated with the schedule in that matter.

Respectfully Submitted,

PRICKETT, JONES & ELLIOTT, P.A.

OF COUNSEL
(INTERIM CLASS COUNSEL):

Michael D. Hausfeld
Daniel A. Small
Brent W. Landau
Allyson B. Baker
COHEN, MILSTEIN, HAUSFELD
& TOLL, P.L.L.C.
1100 New York Avenue, N.W.
Suite 500, West Tower
Washington, D.C. 20005

Michael P. Lehmann
Thomas P. Dove
Alex C. Turan
THE FURTH FIRM LLP
225 Bush Street, 15th Floor
San Francisco, CA 94104

Steve W. Berman
Anthony D. Shapiro
Craig R. Spiegel
HAGENS BERMAN SOBOL
SHAPIRO, LLP
1301 Fifth Avenue, Suite 2900
Seattle, WA 98101

Guido Saveri
R. Alexander Saveri
SAVERI & SAVERI, INC.
111 Pine Street, Suite 1700
San Francisco, CA 94111

By: /s/ James L. Holzman
James L. Holzman (#663)
J. Clayton Athey (#4378)
Eric M. Andersen (#4376)
1310 King Street
P.O. Box 1328
Wilmington, DE 19899
jlholzman@prickett.com
jcathey@prickett.com
emandersen@prickett.com

Interim Liaison Counsel

Attorneys for Plaintiffs

POTTER, ANDERSON & CORROON LLP

OF COUNSEL:

Richard A. Ripley
BINGHAM McCUTCHEN LLP
2020 K Street, N.W.
Washington, DC 20006
Telephone: (202) 373-6000
Facsimile: (202) 373-6001

David M. Balabanian
Christopher B. Hockett
Nora C. Cregan
BINGHAM McCUTCHEN LLP
Three Embarcadero Center
San Francisco, CA 94111-4067
Telephone: (415) 393-2000
Facsimile: (415) 393-2286

By: /s/ Richard L. Horwitz

Richard L. Horwitz (#2246)
W. Harding Drane, Jr. (#1023)
Hercules Plaza, 6th Floor
1313 North Market Street
P.O. Box 951
Wilmington, DE 19801
Telephone: (302) 984-6000
Facsimile: (302) 658-1192
rhorwitz@potteranderson.com
wdrane@potteranderson.com

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Attorneys for Defendant
INTEL CORPORATION